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November 18, 2020

VIA ECF

Honorable Philip M. Halpern
United State District Judge, SDNY
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, New York 10007

Re: Florence Walker v. Dr. Crossley O'Dell, 17 Civ. 8120 (PMH)

Your Honor:

I represent the plaintiff Florence Walker in the above-referenced matter. I write jointly on behalf of all parties to respectfully request a short enlargement of time, from November 18, 2020 to November 23, 2020 for the parties to file their proposed voir dire questions, joint jury charge, and a joint verdict form in compliance with Rule 6(B) of the Court's Individual Practices. Pursuant to the Court's Individual Practices, the parties are trying to reach an agreement regarding the language and content that will be included in each of the documents due to be filed with the Court, and the parties have made significant progress in that regard. As the Court may recall, earlier this week plaintiff requested a two day enlargement of time to file these documents because upon receiving defendant's proposed jury charge Upon review of certain portions of defendant's proposed jury charge, it became necessary for counsel for plaintiff to conduct additional research about whether portions of defendant's proposed charge were legally correct. Counsel for plaintiff has since completed the necessary research and based, in part, on the research proposed extensive amendments to defendant's proposed jury charge. Defense counsel was not provided with the proposed amendments until after noon today. Consequently, defense counsel requires an opportunity to review the proposed amendments and meet and confer with counsel for plaintiff to see whether the parties reach an agreement about what should be contained in a jointly proposed jury charge. For these reasons, the parties respectfully request that the Court grant the parties' a short enlargement of time until November 23, 2020 to file these documents. This is plaintiff's second request for an extension of time for the parties to file these documents, and it the first request made jointly on behalf of all parties.

We thank the Court for its consideration of this matter.

Application granted.

SO ORDERED.

Philip M. Halpern, U.S.D.J.

Dated: New York, NY
November 19, 2020

Respectfully submitted,

/s

DAVID M. HAZAN, ESQ.